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1 CLARK COUNTY SCHOOL DISTRICT  
2 OFFICE OF THE GENERAL COUNSEL  
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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

11 DESHUN THOMAS, individually, and as  
12 Natural Parent and Guardian for L.J., and  
13 KRISTIN WOODS as Co-Guardian Ad Litem  
14 for L.J.,

15 Plaintiffs,

16 v.

17 BEVERLY DADE, individually, and in her  
18 official capacity; RICHARD FULLER,  
19 individually, and in his official capacity;  
20 PATRICIA SCHULTZ, individually, and in  
21 her official capacity; PAT SKORKOWSKY,  
22 individually, and in his official capacity;  
23 CLARK COUNTY SCHOOL DISTRICT, a  
24 Political Subdivision of the State of Nevada,  
25 DOE TEACHER'S AIDE, in his/her official  
26 capacity; DOES I through X, inclusive; and  
27 ROES I though X, inclusive,

28 Defendants.

Case No. 2:19-cv-01019-JAD-BNW

**STIPULATION AND ORDER TO  
EXTEND TIME TO FILE RESPONSIVE  
PLEADING**

**[FIRST REQUEST]**

Plaintiffs Deshun Thomas, individually and as the natural parent and guardian of minor L.J., and Kristin Woods, co-guardian ad litem for L.J. (hereinafter, "Plaintiffs"), and Defendants Clark County School District, Richard Fuller, Beverly Dade, Patricia Schultz and Pat Skorkowsky, by and through their respective attorneys of record, hereby stipulate to extend the

1 time for Defendants County School District, Richard Fuller, and Beverly Dade (hereinafter,  
2 “Defendants”)<sup>1</sup>, to file a responsive pleading from the current deadline of August 2, 2019 for  
3 seven (7) days, up to and including **August 7, 2019**. This is the first request for an extension of  
4 time to the responsive pleading deadline.

5 Defendants seek the extension of time so as to allow one, or at most two, responsive  
6 pleading(s) to be filed on behalf of the defendants. Indeed, Plaintiffs served the defendants with  
7 process at different times which resulted in Defendants Clark County School District, Richard  
8 Fuller, and Beverly Dade filing a Motion to Dismiss on June 21, 2019 (ECF No. 6), and  
9 Defendants Patricia Schultz and Pat Skorkowsky filing a separate Motion to Dismiss on July 15,  
10 2019 (ECF No. 19). The Court recently ruled on the first motion to dismiss and granted it in its  
11 entirety thereby dismissing the second and third causes of action for violation of 42 U.S.C. §  
12 12101, et seq. and 29 U.S.C. § 794 as against Fuller and Dade; the eighth cause of action for IIED  
13 as asserted by Deshun Thomas, individually, as against CCSD, Fuller, and Dade; and the ninth  
14 cause of action for violation of NRS 41.1395 as against CCSD, Fuller, and Dade. ECF No. 23.  
15 The Court also denied Plaintiffs’ request for leave to amend the complaint. *Id.* Because the  
16 Court’s ruling pertains to arguments raised in the second motion to dismiss, Plaintiffs are in the  
17 process of stipulating with defendants and responding to remaining claims and arguments. This  
18 may render all or part of the Motion moot and cause Defendant Patricia Schultz and/or Pat  
19 Skorkowsky to join in any responsive pleading. In an effort to simplify the issues before the  
20 Court and avoid filing unnecessary or duplicative pleadings, the parties hereby stipulate to a short  
21 extension of time, until August 7, 2019, for Defendants County School District, Richard Fuller,  
22 and Beverly Dade to respond to the complaint.

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26 <sup>1</sup> Defendants Patricia Schultz and Pat Skorkowsky do not join in the request for an extension of  
27 time because they have a Motion to Dismiss pending before the Court. (ECF No. 19). However,  
28 as provided herein, the parties are working on stipulations which may render all or part of that  
Motion moot and cause either defendant to join in any responsive pleading.

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This request is made in good faith and not for the purpose of delay.

Dated: August 2, 2019

Dated: August 2, 2019

GANZ & HAUF

CLARK COUNTY SCHOOL DISTRICT  
OFFICE OF THE GENERAL COUNSEL

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*Attorney for Defendants*

**ORDER**

**IT IS SO ORDERED.**

Dated this 8th day of August, 2019.

  
UNITED STATES DISTRICT JUDGE